REMARKS

Claims 1-47 are pending after this amendment. Claims 12-19, 21-28, 31, and 32 are withdrawn.

The remarks presented herein are in response to the Non-Final Office Action dated September 9, 2005.

The Examiner rejected claims 33, 34, 36, 44, and 45 under 35 USC 102(b) as being anticipated by Nguyen. This rejection is respectfully traversed.

Claim 33 recites:

"A method for operating a personal electronic device, the personal electronic device including a lid, a power button, a processor, a memory, and a plurality of applications stored in the memory, the method comprising:
responsive to the lid being opened, when the device is off, activating the device and executing by the processor a first user-selectable application stored in the memory of the personal electronic device; and
responsive to activation of the power button, when the device is off, activating the device and executing by the processor a second user-selectable application stored in the memory of the personal electronic device."

Claim 44 recites:

"A method for operating a personal electronic device, the personal electronic device including a lid, a power button, a processor, a memory, and a plurality of applications stored in the memory, the method comprising:
responsive to the lid being opened, when the device is off, activating the device and executing by the processor a mobile phone application stored in the memory of the personal electronic device; and
responsive to activation of the power button, when the device is off, activating the device and executing by the processor the mobile phone application stored in the memory of the personal electronic device."

Claim 33 recites two method steps, each of which is performed responsive to a different user action. The first method step takes place in response to the lid being opened when the device is off. Responsive to this action taking place, the device is activated and a first application is executed. The second method step takes place in response to the power button being activated. Responsive to this action taking place, the device is activated and a second application is executed. Thus, the device can be used in different ways depending on how the user chooses to activate the device. The user need not specify which application to execute by pressing one of a number of application buttons or by selecting from a menu. Rather, the user need only open the lid or turn on the power button, and depending on which of these two actions is taken, a first or second application is executed. In addition, the user can select which application is associated with each of these actions.

Claim 44 similarly recites two method steps, each of which is performed responsive to a different user action. A first method step takes place in response to the lid being opened when the device is off. The second method step takes place in response to the power button being activated. Responsive to either action taking place, the device is activated and a mobile phone application is executed. Thus, the user can choose to activate the device and the mobile phone application in either of these two ways.

Nguyen fails to teach or disclose either of these methods. The device described in Nguyen has two different components, referred to as a PDA unit and a telephone unit. Each of these units can be separately turned on or off by the user.

Depending on which of the units is on and which is off, and depending on whether the device is in an open or closed position, Nguyen's device functions in different ways. Specifically, when the device is closed and the phone power is on, the device functions as a cell phone. When the device is open, different functions are enabled as follows:

- PDA power off, phone power off: do nothing

- PDA power off, phone power on: perform as a cell phone and allow keyboard entry of numbers

- PDA power on, phone power on: enable PDA functions and fax phone function

- PDA power on, phone power off: enable PDA functions

Thus, in Nguyen, the PDA power button causes PDA functions to be enabled, but does not work if the lid is closed. The phone power button causes the device to work as a cell phone (or fax), whether or not the lid is closed.

In other words, the closed-lid state causes the PDA power button to be non-functional while allowing the phone power button to function. However, there is no hint or suggestion in Nguyen of **causing something to happen in response to opening the lid**. Specifically, there is no teaching of executing an application in response to the lid being opened, as claimed herein. Furthermore, there is no hint or suggestion of any technique of providing ways to activate a first application by opening a lid and a second application by pressing a power button. Nguyen also fails to dis-

close any technique of providing two ways to activate a mobile phone application including pressing a power button and opening a lid.

Furthermore, in Nguyen, the current state (open or closed) does not change the function that is made available. Rather, it is the user's selection of **which button is pressed** that determines which function is made available. The only effect of the closed state is that it prevents the PDA function from operating (but has no effect on the phone function). Accordingly, there is no hint or suggestion of any technique of using the open/closed state of the device to select between a first and second application to be activated.

Accordingly, claims 33 and 44 are respectfully submitted to be patentable over the cited reference.

Claims 34-36 depend from claim 33 and incorporate all of the limitations of claim 33. Claim 45 depends from claim 44 and incorporates all of the limitations of claim 44. Claims 34-36 and 45 further recite additional limitations not found in the cited reference. For at least the reasons stated above with respect to claims 33 and 44, claims 34-36 and 45 are respectfully submitted to be patentable over the cited reference.

The Examiner rejected claims 1, 2, 7-11, 20, 29, 30, 35, 37-39, 40-43, and 46 under 35 USC 102(b) as being anticipated by Nguyen in view of Boesen. This rejection is respectfully traversed.

It is assumed that the Examiner intended the rejection to be based on 35 USC 103, since a 102(b) rejection requires all of the claimed features to be taught by a single reference. As stated by the Examiner, Nguyen fails to disclose various elements of these claims.

Claim 1 recites:

> "A method for operating a personal digital assistant (PDA), the PDA including a lid, a power button that activates the PDA, a processor, a memory, and a plurality of applications stored in the memory, the method comprising:
> > responsive to the lid being opened, activating the PDA and executing by the processor a first application stored in the memory of the PDA; and
> > responsive to activation of the PDA power button when the lid is closed, activating the PDA and executing by the processor a second application stored in the memory of the PDA."

Claim 1 recites two method steps, each of which is performed responsive to a different user action. The first method step takes place in response to the lid of a PDA being opened. Responsive to this action taking place, the PDA is activated and a first application is executed. The second method step takes place in response to the PDA power button being activated when the lid is closed. Responsive to this action taking place, the PDA is activated and a second application is executed. Thus, the PDA can be used in different ways depending on how the user chooses to activate the PDA. The user need not specify which application to execute by pressing one of a number of application buttons or by selecting from a menu. Rather, the user need only open the PDA's lid or turn on the PDA power button, and depending on which of these two actions is taken, a first or second application is executed.

Neither Nguyen nor Boesen provides any hint or suggestion of causing something to happen in response to opening the lid. Specifically, there is no teaching of executing an application in response to the lid being opened, as claimed herein. Furthermore, there is no hint or suggestion of any technique of providing ways to activate a first application by opening a lid and a second application by pressing a PDA power button.

Furthermore, as correctly stated by the examiner, Nguyen fails to disclose executing a second application when the lid is closed. The Examiner asserts that Boesen teaches such a feature. Boesen states, at paragraph 0052, "When in a closed position, the key pad buttons 22 are still available and the display 4 is also available." Other than this statement of the existence of buttons that are available when the device is in a closed position, there is no discussion of using such buttons to activate particular applications depending on the open/closed state of the device. In particular, there is no hint or suggestion in Boesen of using the open/closed state of the lid to determine which of a first or second application to activate. In fact, neither Nguyen nor Boesen, taken alone or in any combination, disclose the technique of activating the PDA and executing a first application or activating the PDA and executing a second application, responsive to either the lid being opened or the PDA power button being activated when the lid is closed, respectively.

Claim 7 is similar to claim 1, but recites an application button instead of a PDA power button. Claim 30 is a computer program product claim reciting limita-

tions similar to those of claim 1. Accordingly, the arguments set forth above apply to claims 7 and 30.

Accordingly, claims 1, 7, and 30 are respectfully submitted to be patentable over the cited references.

Claims 2, 3, and 37-43 depend from claim 1 and incorporate all of the limitations of claim 1. Claim 8 depends from claim 7 and incorporates all of the limitations of claim 7. Claims 2, 3, 37-43, and 8 further recite additional limitations not found in the cited reference. For at least the reasons stated above with respect to claims 1 and 7, claims 2, 3, 37-43, and 8 are respectfully submitted to be patentable over the cited reference.

Claim 9 recites:

"A method for operating a personal digital assistant (PDA), the PDA including a lid, a processor, a memory, and a plurality of applications stored in the memory, the plurality of applications stored in the memory including an alarm application, the method comprising:
responsive to the lid being opened, activating the device and executing by the processor a first application stored in the memory of the PDA; and
responsive to a signal from the alarm application, activating the device and executing by the processor the alarm application."

Claim 9 recites two method steps, each of which is performed responsive to a different trigger event. The first method step takes place in response to the lid being opened. Responsive to this action taking place, the device is activated and a first application is executed. The second method step takes place in response to a signal from an alarm application. Responsive to this signal, the device is activated and an alarm application is executed. Thus, the device can be used in different ways de-

pending on how the device is activated. The user need not specify which application to execute by pressing one of a number of application buttons or by selecting from a menu.

Neither Nguyen nor Boesen provides any hint or suggestion of causing something to happen in response to opening the lid. Specifically, there is no teaching of executing an application in response to the lid being opened, as claimed herein. Furthermore, there is no hint or suggestion of any technique of providing ways to activate a first application by opening a lid and an alarm application in response to a signal from the alarm application.

The Examiner correctly states that Nguyen does not disclose an alarm application, nor does it disclose activating the device and executing the alarm application responsive to a signal from the alarm application. The Examiner cites Boesen are teaching this element.

On the contrary, Boesen makes no mention of an alarm application that is used in the manner recited in claim 9. The cited portion of Boesen (paragraph 0046) discusses a vibration module to alert a user of electronic messages or other events. There is no hint or suggestion in Boesen of a separate alarm application that can be activated responsive to a signal in the manner claimed herein.

Accordingly, claim 9 is respectfully submitted to be patentable over the cited references.

Claims 10 and 11 depend from claim 9 and incorporates all of the limitations of claim 9. Claims 10 and 11 further recite additional limitations not found in the

cited reference. For at least the reasons stated above with respect to claim 9, claims 10 and 11 are respectfully submitted to be patentable over the cited reference.

Claim 20 recites:

> "A method for operating a personal digital assistant (PDA), the PDA including a lid, a wireless communication module, a processor, a memory, and a plurality of applications stored in the memory, the method comprising:
>> determining that the lid has been opened;
>> responsive to the lid having been opened:
>> turning on the PDA; and
>> automatically launching a phone application."

According to the method of claim 20, the PDA is turned on and a phone application is automatically launched responsive to a lid having been opened. Thus, the user need not specify that he or she wishes to launch a phone application; rather, the act of opening the lid automatically turns on the PDA and launches the appropriate application.

Nguyen fails to teach or suggest such a method. The cited portion of Nguyen (column 6, lines 58-61 and column 7, lines 4-21) discloses a technique for determining whether the device is in an open position and determining whether the power is on. Depending on which power is on (telephone unit and/or PDA unit), appropriate functions are enabled. However, there is no hint or suggestion in Nguyen of turning on the device in response to the lid being opened. Nor is there any hint or suggestion of automatically launching a phone application in response to the lid being opened. Since neither of these steps is disclosed by Nguyen, Applicants respectfully submit that the claim is not anticipated by the cited reference.

Accordingly, claim 20 is respectfully submitted to be patentable over the cited references.

Claim 29 recites:

"An integrated personal digital assistant (PDA) comprising:
  a base;
  a processor, for executing software instructions on the PDA;
  a memory, for storing software instructions to be executed by the processor;
  a plurality of applications stored in the memory,
  a lid, coupled to the base, for activating the PDA when opened, and causing the processor to execute a first application stored in the memory; and
  a power button, coupled to the base, for when the lid is closed activating the PDA when pressed, and causing the processor to execute a second application stored in the memory."

Claim 29 recites two elements that cause the processor to execute a first or second application, each of which is performed responsive to a different user action. The lid activates the PDA when opened, and causes a first application to be executed. The power button, when pressed while the lid is closed, activates the PDA and causes a second application to be executed. Thus, the PDA can be used in different ways depending on how the user chooses to activate the PDA. The user need not specify which application to execute by pressing one of a number of application buttons or by selecting from a menu. Rather, the user need only open the PDA's lid or turn on the PDA power button, and depending on which of these two actions is taken, a first or second application is executed.

Neither Nguyen nor Boesen provides any hint or suggestion of causing something to happen in response to opening the lid. Specifically, there is no teaching of executing an application in response to the lid being opened, as claimed herein. Fur-

thermore, there is no hint or suggestion of any technique of providing ways to activate a first application by opening a lid and a second application by pressing a PDA power button.

Furthermore, as correctly stated by the examiner, Nguyen fails to disclose executing a second application when the lid is closed. The Examiner asserts that Boesen teaches such a feature. Boesen states, at paragraph 0052, "When in a closed position, the key pad buttons 22 are still available and the display 4 is also available." Other than this statement of the existence of buttons that are available when the device is in a closed position, there is no discussion of using such buttons to activate particular applications depending on the open/closed state of the device. In particular, there is no hint or suggestion in Boesen of using the open/closed state of the lid to determine which of a first or second application to activate. In fact, neither Nguyen nor Boesen, taken alone or in any combination, discloses the technique of activating the PDA and executing a first application responsive to the lid being opened and activating the PDA and executing a second application, responsive to the PDA power button being activated when the lid is closed.

Accordingly, claim 29 is respectfully submitted to be patentable over the cited references.

Claim 4 recites:

"A method for operating a personal digital assistant (PDA), the PDA including a lid, a jog rocker, a processor, a memory, and a plurality of applications stored in the memory, the method comprising:
    responsive to the lid being opened, activating the device and executing by the processor a first application stored in the memory of the PDA; and

> responsive to activation of the jog rocker, activating the device and executing by the processor a second application stored in the memory of the PDA."

Claim 4 recites two method steps, each of which is performed responsive to a different user action. The first method step takes place in response to the lid of a PDA being opened. Responsive to this action taking place, the PDA is activated and a first application is executed. The second method step takes place in response to the jog rocker being activated. Responsive to this action taking place, the PDA is activated and a second application is executed. Thus, the PDA can be used in different ways depending on how the user chooses to activate the PDA. The user need not specify which application to execute by pressing one of a number of application buttons or by selecting from a menu. Rather, the user need only open the PDA's lid or activate the jog rocker, and depending on which of these two actions is taken, a first or second application is executed.

Neither Nguyen, Boesen, nor Takahashi provides any hint or suggestion of causing something to happen in response to opening the lid. Specifically, there is no teaching of executing an application in response to the lid being opened, as claimed herein. Furthermore, there is no hint or suggestion of any technique of providing ways to activate a first application by opening a lid and a second application by pressing a PDA power button.

Furthermore, as correctly stated by the examiner, Nguyen fails to disclose executing a second application responsive to activation of a jog rocker. The Examiner

asserts that Takahashi teaches such a feature. However, the jog dial disclosed by Takahashi merely generates a input symbol when pressed; there is no teaching or suggestion in Takahashi of using its jog dial as a trigger for activating a PDA and executing an application as claimed herein. In particular, there is no hint or suggestion in Takahashi of using the open/closed state of the lid to determine which of a first or second application to activate. In fact, neither Nguyen, Boesen, nor Takahashi, taken alone or in any combination, discloses the technique of activating the PDA and executing a first application responsive to the lid being opened, and activating the PDA and executing a second application responsive to the PDA power button being activated when the lid is closed.

Accordingly, claim 4 is respectfully submitted to be patentable over the cited references.

Claims 5 and 6 depend from claim 4 and incorporate all of the limitations of claim 4. Claims 5 and 6 further recite additional limitations not found in the cited reference. For at least the reasons stated above with respect to claim 4, claims 5 and 6 are respectfully submitted to be patentable over the cited reference.

On the basis of the above remarks, consideration of this application and the early allowance of all claims herein are requested.

Should the Examiner wish to discuss the above remarks, or if the Examiner believes that for any reason direct contact with Applicants' representative would help

to advance the prosecution of this case to finality, the Examiner is invited to tele-

phone the undersigned at the number given below.

Respectfully submitted,
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